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NBC Operations, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHANEQUA NORMAN,

Plaintiff,

vs.

NBC OPERATIONS, LLC a Foreign Limited
Liability Company licensed to do business in
Nevada,

Defendant.

Case No.: 2:21-cv-01415-RFB-DJA

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO COMPLAINT**

(FIRST REQUEST)

Plaintiff Shanequa Norman (“Plaintiff”) and Defendant NBC Operations, LLC (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Defendant’s deadline to respond to Plaintiff’s complaint **from August 5, 2021, to August 16, 2021.**

WHEREAS:

1. Plaintiff filed suit against Defendant in the Eighth Judicial District Court of Clark County, Nevada on June 29, 2021. ECF No. 1.

2. On July 29, 2021, Defendant filed a Notice of Removal of Action in the Eighth Judicial District Court and a Petition for Removal in this Court. ECF No. 1.

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3. Federal Rule of Civil Procedure 81(c)(2)(C) requires that a defendant that has not answered or otherwise opposed a complaint must answer or present other defenses within 7 days after the notice of removal is filed.

4. Defendant's answer or motion is therefore currently due on August 5, 2021.

5. The Parties previously stipulated to an extension in state court to August 11, 2021.

6. Defendant ask for a few additional days, to August 16, 2021, as it just retained counsel.

7. Defendant needs additional time to adequately investigate and prepare its response to Plaintiff's complaint.

8. This extension request is sought in good faith and is not made for the purpose of delay.

9. This is the first request before this Court for a stipulation to extend Defendant's deadline to respond to Plaintiff's complaint.

10. Nothing herein shall be construed as a waiver or limit on Plaintiff's ability to seek remand.

THEREFORE, the Parties respectfully request an extension for Defendant to file its answer or motion from August 5, 2021, to, and including, August 16, 2021.

Dated: August 4th, 2021

Dated: August 4th, 2021

ARMSTRONG TEASDALE LLP

LAW OFFICE OF MARY CHAPMAN

By: /s/ Tracy A. DiFillippo

By: /s/ Mary F. Chapman

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NBC Operations, LLC*

ORDER

IT IS ORDERED that, pursuant to a stipulation between the Parties and good cause appearing, the deadline for Defendant to answer or otherwise oppose the complaint [ECF No. 1] is extended from August 5, 2021, to, and including, August 16, 2021.

IT IS SO ORDERED.

DATED: this 5th day of August 2021.

A handwritten signature in blue ink, appearing to read 'D. Albregts', is written over a horizontal line.

Daniel J. Albregts
United States Magistrate Judge

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 (b). and Section IV of District court of Nevada Electronic Filing Procedures, certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing was served:

☒ via electronic service to the parties listed in CMECF for this case.

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